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Attorneys for Defendant  
Mr. Trejo

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:24-cr-69-TLN-1
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>STATUS CONFERENCE AND EXCLUDE TIME</b>
MANUEL TREJO.	) Date: April 10, 2025
Defendants.	) Time: 9:30 a.m.
	) Judge: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorneys Emily Grace Sauvageau and Matthew de Moura, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Manuel Trejo that the Status Conference currently set for April 10, 2025 at 9:30 be continued to May 1, 2025 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a Status Conference to be held on April 10, 2025, at 9:30 a.m.
2. Mr. Trejo moves for the Status Conference to be continued to May 1, 2025 at 9:30 a.m.

3. To date, the government has produced 96 pages, 59 videos, and 12 audio files in discovery. It made an offer to Mr. Trejo on January 27, 2025.

4. Mr. Trejo requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial. Defense counsel is working his way through the audio/video files, many of which are more than half an hour long.

5. Mr. Trejo believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

6. The government does not object to the continuance request.

7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between April 10, 2025 and May 1, 2025, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: April 4, 2025

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Trejo

Date: April 4, 2025

MICHELE BECKWITH  
Acting United States Attorney

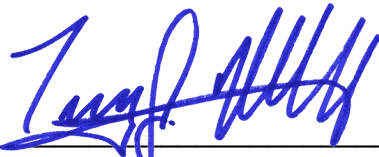
/s/ Emily G. Sauvageau  
EMILY G. SAUVAGEAU  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 4, 2025

  
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Troy L. Nunley  
Chief United States District Judge